

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE WESTERN DISTRICT OF MISSOURI
3 WESTERN DIVISION
4
5
6 KEITH CARNES,
7 Plaintiff,
8 vs. Case No. 4:23-cv-00278-RK
9 ROBERT BLEHM, et al.,
10 Defendants.
11
12
13
14
15
16 VOLUME 1
17 VIDEO-RECORDED VIDEOCONFERENCE DEPOSITION OF
18 LORIANNE MORROW, a witness, taken on behalf of the
19 Plaintiff, pursuant to Notice, on May 31, 2024,
20 before
21
22 SUSAN J. MUCKENTHALER
23
24 Certified Verbatim Reporter, Certified in Missouri
25 and Kansas.

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13	Reporter's Note: Electronic exhibits provided by counsel were made OCR searchable (PDF), downsampled to 600 dpi, digitally labeled if not previously labeled, flattened, archived as original exhibits, and provided electronically to all ordering counsel. Processing electronic exhibits can change the file size, resolution, and metadata of files originally provided.	
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17	(ph) indicates a phonetic spelling.	
18		
19	[sic] indicates the text is as stated.	
20		
21	Quoted text is as stated by the speaker.	
22		
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1 APPEARANCES

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STIPULATIONS

19 It was stipulated and agreed by and between
20 counsel that the deposition officer can administer a
21 binding oath to the witness by videoconference.

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1 THE REPORTER: Good afternoon. My name is
2 Susan Muckenthaler. I am a Missouri-certified court
3 reporter. We are now on the record. Today's date
4 is May 31st, 2024, and the time is approximately
5 1:07 p.m.

6 This is the Zoom-recorded deposition of
7 Lorianne Morrow in the matter of Keith Carnes versus
8 Robert Blehm, et al., Case No. 4:23-cv-00278-RK.
9 The video recording is not being externally
10 monitored or recorded by a videographer.

11 Would counsel please identify yourselves
12 and whom you represent and agree on the record that
13 there is no objection to this deposition officer
14 administering a binding oath to the witness by
15 videoconference.

16 MR. HILKE: Wally Hilke for plaintiff
17 Keith Carnes. We agree.

18 MS. PETERS: Diane Peters for all the
19 defendants except Amy McGowan, and I don't object.

20 MR. HANER: And Josh Haner on behalf of
21 defendant Amy McGowan, and I agree.

22 LORIANNE MORROW,
23 a witness, being first duly sworn, testified under
24 oath as follows:

25

Exhibit W1 (Morrow's 2024 deposition)

8700 Monrovia, Suite 310

Lenexa, Kansas 66215-3500

www.cornerstonekc.net

<p>1 EXAMINATION 2 BY MR. HILKE: 3 Q. Good afternoon, Ms. Morrow. Can you hear 4 me okay? 5 A. I can hear you just fine. 6 Q. Good. As I mentioned, my name is Wally 7 Hilke. I'm one of the lawyers for the plaintiff, 8 Keith Carnes, in this lawsuit. The defendants in 9 this lawsuit, who are represented by attorneys here, 10 are officers and detectives with the Kansas City 11 Police Department as well as Amy -- Amy McGowan. 12 I want to -- I know you have had your 13 deposition taken before, but I want to go over a few 14 things to keep us going smoothly today. So even 15 though you're in your home, you've sworn an oath to 16 tell the truth, and this deposition will proceed 17 exactly like it would if it were in a court 18 reporter's office. Do you understand all that? 19 A. Yes, I do. 20 Q. Just like then, we all have to talk one at 21 a time so the court reporter can take down 22 everything we say. Does that make sense? 23 A. Makes a lot of sense to me. 24 Q. I want to make sure you understand all my 25 questions, whether it's a bad Zoom connection or a</p>	<p>Page 5 1 know what happened in -- you know, I mean -- 2 Q. Okay. 3 A. Yeah. 4 Q. Good. 5 And so you don't know of any reason why 6 you couldn't -- is there any reason you couldn't 7 accurately remember and testify as to your knowledge 8 relating to this case today? 9 A. I can remember things to the best of my 10 knowledge. But at that point in time, I was sick, 11 which I say still am now, but I -- it's -- I'm under 12 better control than it was back then. 13 Q. Okay. Thank you. 14 And, Ms. Morrow, you and I have spoken 15 before; correct? 16 A. Correct. 17 Q. And I asked you to tell me what you 18 remembered regarding Larry White's murder; correct? 19 A. Correct. 20 Q. And did I ask you to tell me the truth 21 when we talked? 22 A. Yes. 23 Q. Did I make you any promises? 24 A. No. 25 Q. Did I threaten you in any way when we</p>
<p>Page 6 1 bad question from me; so will you please ask me to 2 clarify if you do not understand my question for any 3 reason during the deposition today? 4 A. Yes, I will. 5 Q. And are you -- are you prepared to give 6 testimony today? 7 A. Yes, I am. 8 Q. Is there any -- 9 MR. HILKE: Diane, I don't think you meant 10 to, but you shared your screen right now. 11 (Discussion off the record.) 12 Q. (By Mr. Hilke) And is there any reason -- 13 you know, health, medication, anything else -- why 14 you wouldn't be able to give honest and accurate 15 testimony today? 16 A. Say that again. I couldn't hear you. You 17 got to talk a little louder. 18 Q. You got it. 19 I'm wondering if there's any reason -- 20 like, you know, if you had recently taken a strong 21 medication or you were having a health issue -- why 22 you could not give true and accurate testimony 23 today? 24 A. My health don't have nothing to do with 25 it. I will give the true testimony that -- what I</p>	<p>Page 8 1 talked? 2 A. No. 3 Q. And so you've -- I want to -- and I know 4 you've testified multiple times regarding what you 5 remember from Larry White's murder, and I may ask 6 you to go over some things that you've testified 7 about previously. 8 And I guess I'll -- I'll start with this: 9 On October 7 -- or I guess October 6, 2003, were you 10 present in the area of 29th Street and Wabash Avenue 11 that evening? 12 A. Yes, I was. 13 Q. All right. I'm going to share my screen 14 with you for a minute here and mark an exhibit. 15 Let's -- let's mark this Exhibit 1. This is a map 16 representing the area of 29th Street and Wabash 17 Avenue. Are you able to see this on your screen? 18 A. Yes. I'm familiar with that area because 19 I grew up in that area. 20 Q. Okay. Good. 21 A. I'm very familiar with it. 22 Q. Good. I'm -- I'm just going to leave it 23 up while we talk because it may help me, since I 24 didn't grow up there, to ask you some questions 25 about where you were and what happened. Okay.</p>

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1 **What -- so on October 7, 2003 -- or --**
 2 **so -- I'm sorry. Strike that.**
 3 **On October 6, 2003, when you were in the**
 4 **area of 29th Street and Wabash Avenue, can you tell**
 5 **me -- what were you doing in the area at the time?**
 6 A. I would say I was going on to a friend of
 7 mine's house where -- who -- they lived on 26th --
 8 2604 Benton Boulevard.
 9 **Q. Okay.**
 10 A. Which it wasn't really that far, maybe a
 11 few more blocks over on the other side of -- of the
 12 street -- well, Prospect, I will say.
 13 **Q. Okay. And what time of day did you come**
 14 **into the area, meaning was it in the morning or in**
 15 **the evening?**
 16 A. It was in the evening time.
 17 **Q. Okay. And where were you -- where were**
 18 **you coming from? What direction were you moving**
 19 **towards when you came through the area?**
 20 A. I was actually coming off of 30th and
 21 Wabash.
 22 **Q. Okay.**
 23 A. My niece lived over there at the time.
 24 **Q. Okay. So if I understand the map, you**
 25 **were coming from the south going north through the**

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1 **area. Is that correct?**
 2 A. Right. Right.
 3 **Q. All right. And when you were walking**
 4 **through the area that night, did anything -- did**
 5 **anything unusual happen?**
 6 A. Yes.
 7 **Q. What's -- what's the first unusual thing**
 8 **you remember happening as you walked through the**
 9 **area?**
 10 A. I remember when I was walking through the
 11 area heading towards -- you know, I would be going,
 12 like, north -- north to -- north to east because
 13 east is on the side where the South Benton would be.
 14 I was walking down the street, you know, normally
 15 walking, doing my -- minding my own business, and
 16 the confrontation between Larry and Reggie got on.
 17 He was chasing a man with a gun down the street, you
 18 know. I was trying to hurry up and get away because
 19 on the corner of Prospect, of 29th Street, there's a
 20 church sit there -- sitting there. Right now, still
 21 been there forever. And I -- I -- you know, all
 22 this was happening. I was running towards that way
 23 to -- because there's some stairs down in the bottom
 24 of it to go down there for safety, and he seen me;
 25 and, you know, I seen him as well.

1 **Q. Okay. So you saw -- I think you said you**
 2 **saw Reggie chasing Larry. Is that correct?**
 3 A. Reggie and Kiki.
 4 **Q. Sorry. Reg --**
 5 A. It was Reggie and Kiki.
 6 **Q. Go ahead. Go ahead.**
 7 A. Yes. It was Reggie and Kiki --
 8 **Q. They were --**
 9 A. -- chasing Larry.
 10 **Q. Okay.**
 11 A. Larry was on the --
 12 **Q. And sorry. Just --**
 13 A. Larry started off --
 14 **Q. I don't mean to inter- --**
 15 A. -- when they was --
 16 Okay. Can you hear me?
 17 **Q. I can hear you. I was just going to say**
 18 **wait for my question, and let's go --**
 19 A. Okay.
 20 **Q. -- one question and --**
 21 A. Okay.
 22 **Q. -- answer at a time.**
 23 **It's all right.**
 24 A. Okay. But I had to tell you how it -- at
 25 what corner he was on so you can really get a better

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1 understanding of the whole map you got down there.
 2 You understand what I'm saying?
 3 **Q. I understand. And --**
 4 A. Yes.
 5 **Q. -- our --**
 6 A. Yes.
 7 **Q. -- court reporter -- to be fair to her, we**
 8 **really have to talk one at a time because --**
 9 A. Okay.
 10 **Q. -- she can't --**
 11 A. That's fine. That's fine.
 12 **Q. She can't write down two things at once.**
 13 **And so --**
 14 A. I understand.
 15 **Q. -- if we go --**
 16 THE REPORTER: Okay. Excuse me.
 17 THE WITNESS: Uh-huh.
 18 THE REPORTER: That's -- that's just an
 19 example. When you're answering him "Okay" in the
 20 middle of his question, that's where I can't get it
 21 all. So just pause.
 22 THE WITNESS: Pause. Okay.
 23 THE REPORTER: Okay.
 24 THE WITNESS: All right. I --
 25 THE REPORTER: Thanks.

	Page 13		Page 15
1	THE WITNESS: I understand.	1	Q. What kind of gun?
2	THE REPORTER: Thank you.	2	A. An AK-47.
3	Q. (By Mr. Hilke) So I'm going to -- I'm	3	Q. Is that a pistol or a rifle?
4	going to say, you know, wait for my full question	4	A. A rifle.
5	and then wait a good second to make sure I'm done	5	Q. Was Kiki carrying anything as he chased
6	because I talk slow sometimes. And then --	6	Larry?
7	A. Okay.	7	A. He had a handgun. Maybe a .22 or .38.
8	Q. -- give me your answer --	8	Q. So let me back up a little bit. When you
9	A. I understand --	9	first noticed Kiki and Reggie chasing Larry, where
10	Q. -- and I'll ask --	10	were you located at that time?
11	A. -- (indiscernible).	11	A. I was across the street. There used to be
12	THE REPORTER: Excuse me. See, that was	12	an apartment building over there before you get to
13	an interruption. So just -- just a little pause.	13	the church parking lot to cut across.
14	Thanks.	14	Q. All right. So you were --
15	THE WITNESS: Uh-huh.	15	A. Where I was --
16	Q. (By Mr. Hilke) Okay. So I want to -- I	16	Q. Go ahead.
17	want to take this one -- one step at a time. So	17	A. I would be heading, like, northeast, as I
18	while you were in the area, you noticed Reggie and	18	was saying to you earlier.
19	Kiki chasing Larry; is that correct?	19	Q. Uh-huh.
20	A. Correct.	20	A. Yes, I was, like, on the 20- -- 29th -- it
21	Q. Do you know Larry's last name?	21	would be -- be going, like, towards northeast side,
22	A. White.	22	you know. So corner.
23	Q. And who was -- who was Reggie?	23	Q. Were you between Wabash and Prospect on
24	A. Reggie was a dope dealer that moved in the	24	29th Street at that time?
25	neighborhood.	25	A. Yes.
	Page 14		Page 16
1	Q. And who was Kiki?	1	Q. And where was Larry when you first saw him
2	A. He also was one of the dope dealer that	2	at that time?
3	moved in the neighborhood.	3	A. When I first saw Larry, before I was in
4	Q. Had -- had you interacted with them before	4	between Pros- -- Wabash, he was on -- standing on
5	you saw them that night?	5	the corner of 29th and Olive.
6	A. No.	6	Q. Okay. So he was, you know, a good block
7	Q. Did you know who they were when you saw	7	west of you when you first saw him; is that right?
8	them?	8	A. Yes.
9	A. Yes.	9	Q. And what direction did Larry run in at
10	Q. And how did you know who they were?	10	that time?
11	A. Because they -- they was in the	11	A. He was running east.
12	neighborhood that -- where I knew people that lived	12	Q. Now, did he -- one second. Did you -- you
13	there for a long time. So they was saying the	13	mentioned something about the church -- the church
14	new -- the new D-man, which they were saying -- that	14	parking lot in terms of where you ended up during
15	moved in on the block.	15	this; correct?
16	Q. So is it fair to say you were familiar	16	A. Correct.
17	with them even though you didn't have a relationship	17	Q. And can you describe that, how you ended
18	with them?	18	up in the church parking lot.
19	A. Exactly.	19	A. Well, when -- when he was -- see, you can
20	Q. And when you saw Reggie chasing Larry,	20	look -- I look -- was looking behind me, and they
21	was -- did -- was Reggie holding or carrying	21	was running, chasing him. So I had to get --
22	anything?	22	actually, I had to get out of the way or I probably
23	A. Yes, he was.	23	would have been shot as well. So how I ended up
24	Q. What was he carrying?	24	there -- because I was running away from the
25	A. A gun.	25	gunfire.

1 **Q. And did you take cover in the church**
 2 **parking lot?**
 3 A. Yes, sir, I did.
 4 **Q. Where did you take cover there?**
 5 **Q. In the stair -- in the stairwell. They**
 6 **got some stairwell, lead to a basement.**
 7 **Q. And from the stairwell, were you able to**
 8 **see onto 29th Street from there?**
 9 A. Yes.
 10 **Q. And after you took cover, did you observe**
 11 **anything else?**
 12 A. When he shot -- when he shot Larry -- yes,
 13 I observed it.
 14 **Q. Okay.**
 15 A. And he seen me.
 16 **Q. All right. And did -- and did you see**
 17 **where Larry ultimately ...**
 18 A. He -- he -- when he fell or --
 19 **Q. Yeah, can you --**
 20 A. -- what are you asking me?
 21 **Q. Did you see when he fell?**
 22 A. He fell at Fish Town.
 23 **Q. Okay. And -- and did you see where -- and**
 24 **who did you see? You said you saw someone shoot**
 25 **him. Who did you then see shoot Larry?**

1 A. I see he -- Reggie shoot Larry.
 2 **Q. Okay.**
 3 A. I don't really know his last name or
 4 nothing like that. It's just like if you live in
 5 the neighborhood, you know people.
 6 **Q. Okay. And when you say you saw Reggie and**
 7 **he saw you, did you make eye contact with each**
 8 **other?**
 9 A. Yes, I did.
 10 **Q. Okay. And how did you feel when he made**
 11 **eye contact with you?**
 12 A. I was scared, you know, because I have
 13 never witnessed this before. You know, I have never
 14 witnessed nobody getting murdered in front of your
 15 face.
 16 **Q. Did Reggie have a reputation in the**
 17 **neighborhood at the time?**
 18 A. He had a bad reputation, yes.
 19 **Q. What was his reputation?**
 20 A. He -- he -- what you call it -- "kingpin"
 21 of the drug dealers, you know. He ran all of these
 22 old people out of their apartments because those
 23 apartments that they was in was -- a lot of old
 24 people live there. Yes, he had a bad reputation.
 25 **Q. So -- and, by the way, I'm -- sorry. One**

1 **second.**
 2 A. Okay.
 3 **Q. Now, according to this map, there's, like,**
 4 **an alley going north on 29th Street between the**
 5 **apartment at 2408/2410 East 29th Street and a house**
 6 **at 2846 Wabash. Are you familiar with that alley?**
 7 A. Yes.
 8 **Q. And there's also a driveway between that**
 9 **alley and Wabash Avenue. Are you familiar with that**
 10 **driveway?**
 11 A. Yes.
 12 **Q. And am I correct -- is it -- can you --**
 13 **you know, back in 2003, could you -- was it possible**
 14 **to run up the alley and run east on the driveway to**
 15 **get onto Wabash?**
 16 A. Yes.
 17 **Q. And I think you mentioned hearing shots,**
 18 **if I heard you right, at -- at least two times.**
 19 **Once --**
 20 A. Yes.
 21 **Q. -- before --**
 22 A. Yes.
 23 **Q. -- you took cover and once after. Is that**
 24 **correct?**
 25 A. That's correct.

1 **Q. All right. Now, when you heard shots the**
 2 **first time, where -- like, was there a direction**
 3 **where you heard or saw the shots coming from?**
 4 A. The shots was coming from the direction
 5 of -- it -- that was in the street. So I was on the
 6 sidewalk cutting across the church parking lot.
 7 **Q. Okay. And where -- what was the direction**
 8 **from where you heard or saw the shot?**
 9 **And, by the way, the first time you heard**
 10 **or saw the shots, did you see them or hear them or**
 11 **both?**
 12 A. I seen them chasing him, and I seen -- I
 13 seen the fire from the gun.
 14 **Q. And in part of the chase you observed, did**
 15 **any of it involve, like, the alley and the driveway**
 16 **we were just talking about around 2846 Wabash?**
 17 A. Yes. Yes.
 18 **Q. And so during the chase, did you -- during**
 19 **the chase, did you see Kiki and Reggie coming**
 20 **southwards from the driveway at 2846 Wabash?**
 21 A. You have to jump a fence --
 22 **Q. Okay.**
 23 A. -- to get -- get over to get into Wabash.
 24 It's -- you have to come across a fence to get over
 25 there. It wasn't a tall fence. It's just -- like,

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1 they jumped over.
 2 **Q. Is that what they did?**
 3 A. Yes.
 4 **Q. Okay. And so during that part of the**
 5 **chase, can you tell me, like, where -- so I want you**
 6 **just to use Fish Town as a point of reference --**
 7 **right? -- Fish Town, like, all the way east --**
 8 A. Fish Town.
 9 **Q. -- on 29th Street.**
 10 A. Uh-huh.
 11 **Q. Was Larry White between you and the**
 12 **shooters?**
 13 A. At this point, I had got out of the way so
 14 he was running from the shooters.
 15 **Q. All right. And you --**
 16 A. So I was up a -- I've -- I'm going to
 17 explain this to you. I was up a little way from
 18 him.
 19 **Q. Uh-huh. So --**
 20 A. I wasn't completely hit the parking lot
 21 yet at the church. So yes.
 22 **Q. So it was, like, you are the most -- you**
 23 **were the farthest east, then Larry was running from**
 24 **them and -- and by "them," I mean Kiki and Reggie --**
 25 **and Reggie and Kiki were a little bit west chasing**

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1 **them; is that right?**
 2 A. Right.
 3 **Q. Okay. Thanks.**
 4 **One second. Okay. Now, after you heard**
 5 **the first gunshot, did you look westward in the**
 6 **direction of the apartments, like the apartments at**
 7 **2404 East 29th Street, at any time?**
 8 A. Yes.
 9 **Q. Okay. And was there someone at that time**
 10 **known to you as Tre?**
 11 A. I just heard of his name -- Tre.
 12 **Q. Okay. And do you know -- do you now know**
 13 **the -- the -- I guess, the legal name of the person**
 14 **named Tre?**
 15 A. I just found that out recently, yes.
 16 **Q. Okay. And is he the same person who you**
 17 **testified at his criminal trial for Larry White's**
 18 **murder a couple years later?**
 19 A. Yes.
 20 **Q. Okay. Now, at that time after you heard**
 21 **the first gunshot and you looked towards the**
 22 **apartments, did you observe Tre at that time?**
 23 A. Yes.
 24 **Q. Okay. And did you spend very long, like,**
 25 **watching him or -- at that time?**

1 A. No, I didn't just watch him. No.
 2 **Q. And were there very many people in front**
 3 **of the apartments then?**
 4 A. Yes.
 5 **Q. Okay. And was Tre someone you saw at any**
 6 **time chasing the victim, Larry White?**
 7 A. No.
 8 **Q. Was Tre someone at any time you saw firing**
 9 **a weapon that evening?**
 10 A. No.
 11 **Q. Do you remember what you did after you**
 12 **saw -- sorry. One second.**
 13 **And so I want to ask a minute about -- do**
 14 **you recall that Tre was the defendant in a criminal**
 15 **trial a couple of years after Larry White was shot**
 16 **and that you testified at that criminal trial?**
 17 A. Yes.
 18 **Q. And, by the way, have you reviewed your**
 19 **transcript from that criminal trial at any time?**
 20 A. No.
 21 **Q. And -- and when was the last time -- and**
 22 **you both testified at -- multiple times and signed**
 23 **some affidavits in the 20-plus years since Larry**
 24 **White was murdered; correct?**
 25 A. Correct.

1 **Q. When was the last time you looked at any**
 2 **of those documents, meaning any trial transcripts,**
 3 **any affidavits, anything like that?**
 4 A. I haven't looked at anything.
 5 **Q. Okay.**
 6 A. I -- I really haven't seen the transcript
 7 from any trial.
 8 **Q. So do you recall that at the criminal**
 9 **trial -- meaning Tre or Keith Carnes's criminal**
 10 **trial back in October 2005 -- your testimony was**
 11 **that Keith Carnes had chased Larry and shot and**
 12 **killed him?**
 13 A. Yes.
 14 **Q. Now, was that --**
 15 MS. PETERS: Wally --
 16 MR. HILKE: Go ahead.
 17 MS. PETERS: I'm sorry. I -- I believe
 18 you said "October 2005." I just want to make sure
 19 we have a clean record.
 20 MR. HILKE: Oh, thanks. I'm sorry. I --
 21 I just meant back in 2005, not any specific month.
 22 **Q. (By Mr. Hilke) You remember giving that**
 23 **testimony at a criminal trial in 2005 against Keith**
 24 **Carnes; correct?**
 25 A. Correct.

1 Q. And was that true?
 2 A. No.
 3 Q. And, by the way, do you recall that your
 4 testimony was that Larry had run east on
 5 29th Street, Keith Carnes had chased him, and you
 6 had followed behind the two of them?
 7 A. That -- what -- I don't remember what I
 8 said at that time because I never seen the
 9 transcript; and, you know, at that time I was sick.
 10 Q. Sure. Let me ask you: Is that something
 11 you would do? If you saw a shooting happening,
 12 would you run in the same direction as the shooter?
 13 A. No.
 14 Q. Would you -- now, what would your -- what
 15 would your reaction be if you were on the street at
 16 the time there was a shooting?
 17 A. To take cover.
 18 MS. PETERS: Object to form.
 19 Q. (By Mr. Hilke) Go ahead.
 20 Did you hear my question?
 21 A. Yes. To take cover.
 22 Q. Is that what you actually did when Larry
 23 White was shot and killed in October 2003?
 24 A. I took cover, yes. Because after they
 25 was -- excuse me. Can I say something?

1 Q. You know, you've answered my question;
 2 so --
 3 A. Okay.
 4 Q. -- let me move --
 5 A. Okay. I -- yeah. I take cover.
 6 Can you hear me?
 7 Q. I can.
 8 A. I can barely hear you now. Because you --
 9 Q. I'm going to --
 10 A. -- shaking up.
 11 Q. I'm going to speak --
 12 THE REPORTER: One at a time.
 13 Q. (By Mr. Hilke) Do you know who Amy
 14 McGowan is?
 15 A. Yes.
 16 Q. Who is Amy McGowan?
 17 A. A prosecutor.
 18 Q. Now, after you saw Larry White be shot and
 19 killed, did you interact with Amy McGowan?
 20 A. Yes.
 21 Q. What do you -- did you ever -- and how
 22 long after the shooting, if you can remember, did
 23 you interact with Amy McGowan?
 24 A. A couple of days after the shooting.
 25 Q. Okay. And how did -- how did you come

1 into contact with Amy McGowan?
 2 A. She -- she came to the neighbor- -- that
 3 same neighborhood, yes.
 4 Q. And what was your -- did you speak with
 5 her then?
 6 A. Yes, I did.
 7 Q. What was your conversation with her?
 8 A. The conversation with her was saying that
 9 Keith Carnes did the shooting, and if I didn't, I
 10 would be charged with drug possession -- which I
 11 didn't have drugs on me.
 12 Q. And who said that Keith Carnes was the
 13 shooter in that conversation?
 14 A. Amy.
 15 Q. And did you tell her what you had seen?
 16 A. Yeah.
 17 Q. What did you say to her?
 18 A. I told her that he wasn't the shooter,
 19 that the other guy was, and I told her who he -- who
 20 they were.
 21 Q. And, specifically, who did you tell Amy
 22 McGowan was the shooter?
 23 A. I told her Reggie -- which he had another
 24 street name he was going by, but I just know they
 25 called him "Reggie" -- and Kiki. He had another

1 name. I don't know -- I don't really know his
 2 real -- whole name.
 3 Q. Did you ever -- were you ever taken also
 4 to Amy McGowan's office?
 5 A. Yes.
 6 Q. And did that occur on multiple occasions?
 7 A. Not multiple occasions, maybe two -- two
 8 or three times.
 9 Q. And when you first went to Amy McGowan's
 10 office, how did you get there?
 11 A. What they call those -- those people that
 12 works at the Jackson County Courthouse to pick you
 13 up? Sheriff, I will want to say a sheriff. His
 14 name was Anthony something.
 15 Q. Okay.
 16 A. He worked for the Jackson County
 17 Courthouse.
 18 Q. Okay. And so it was a law enforcement
 19 officer named Anthony; is that right?
 20 A. He worked in the Jackson County
 21 Courthouse; so he would be a law enforcement
 22 officer. They pick up the witnesses -- up -- is
 23 what I'm trying to say.
 24 Q. Okay. And you -- okay.
 25 The first time you talked with Amy McGowan

1 in your -- in her office -- can you tell me what you
 2 remember happening during that interaction.

3 A. Well, I remember that she was showing me
 4 the picture of Mr. Carnes, which I know his name
 5 now, and I was -- and she pulled the book out, and
 6 she had -- you know, how they show you mug shot. So
 7 I was picking out the pictures, and then she picked
 8 out this one photo of Mr. Carnes and said he the one
 9 did it, did the shooting. And at that time, she
 10 also showed me the house where the -- the shell
 11 casing landed. And I didn't see that part, you
 12 know, where that shell casing land, the house and
 13 everything.

14 Q. When you -- the first time you talked to
 15 Amy McGowan in her office, did you tell her who you
 16 saw commit the shooting?

17 A. Yes, I did.

18 Q. And who did you tell her you saw commit
 19 the shooting?

20 A. Reggie and Kiki.

21 Q. And -- and did she say why she was telling
 22 you that it was, instead, Keith Carnes who committed
 23 the shooting?

24 A. Yes. Because they thought he was the big
 25 drug dealer that took over these people apartment.

1 It wasn't him.

2 Q. Now --

3 A. They wanted him off the streets.

4 Q. And when you were -- during that first
 5 interaction with Amy McGowan in her office, did she
 6 say anything to you about, like -- I'm trying to ask
 7 this in an open-ended way. I'm trying to ask if she
 8 said anything to you one way or another about --
 9 well, actually, let me take a step back.

10 A. Okay.

11 Q. Did you -- what was your reaction when Amy
 12 McGowan told you that -- you know, told you who she
 13 wanted -- and, actually, sorry. Let me start one
 14 more time.

15 A. Okay.

16 Q. Did -- when Amy McGowan told you it was
 17 Keith Carnes, was she telling you what she thought,
 18 or was she telling you what she wanted you to say?

19 A. What she wanted me to say.

20 Q. How did you feel when she told you what
 21 she wanted you to say?

22 A. I felt very uncomfortable.

23 Q. And did you ultimately listen to her and
 24 decide to say what she had told you to say instead
 25 of what you saw at Keith Carnes's criminal trial?

1 A. Yes, sir. She threatened -- she
 2 threatened me with jail time and planting drugs on
 3 me. Yes, I did.

4 Q. Do you remember what she said when she
 5 threatened you with jail time and planting drugs on
 6 you?

7 A. She said if I didn't say Keith Carnes did
 8 it that she would plant drugs on me; I would lose my
 9 kids. At the time my kids was around -- well, a
 10 little younger than them; and, you know, I didn't --
 11 "You didn't want that" -- destroying my reputation.
 12 So I did what I was told to do.

13 Q. And you mentioned her taking you to show
 14 you where shell casings were. Is that something Amy
 15 McGowan did with you?

16 A. Actually, when I was in her office, she
 17 had the gun there and she had the pictures -- a
 18 picture of the house, and she told me this is where
 19 the shell casing was at.

20 Q. Okay. Was that something you knew
 21 before --

22 A. No.

23 Q. -- where the shell casings --

24 A. No. No.

25 Q. So you did not know until she told you

1 where the shell casings were; correct?

2 A. No, sir, I did not know. I was not
 3 looking for where the bullets land. I just didn't
 4 want to get hit.

5 Q. Were you ever interviewed by police
 6 officers about Larry White's shooting?

7 A. Once.

8 Q. Where did that interview take place?

9 A. Downtown Kansas City --

10 Q. Is it --

11 A. -- at the headquarters.

12 Q. You said "at headquarters"?

13 A. Uh-huh.

14 Q. Was that somewhere you had been before?

15 A. No.

16 Q. How many officers interviewed you?

17 A. At the time I think it's only -- was two
 18 because it was at nighttime. There was only two
 19 on that -- on that shift.

20 Q. And did they ask you about Larry White's
 21 murder?

22 A. Yes.

23 Q. Did they ask you if you had seen who
 24 committed the shooting?

25 A. Yes.

1 **Q. What did you tell them?**
 2 A. I also told them Kiki and Reggie.
 3 **Q. What did they do after you told them you**
 4 **saw Kiki and Reggie?**
 5 A. They said no, they didn't -- wasn't the
 6 shooter. I guess I -- I'm not going to say they --
 7 every officer is corrupt, but it is a lot of corrupt
 8 police officers. And they told me that -- to say
 9 this -- Tre is the one that killed Larry.
 10 **Q. And so were they telling you what they**
 11 **thought, or were they telling you what to say?**
 12 A. They was telling me what to say.
 13 **Q. And did the -- did -- and, by the way,**
 14 **it -- do you remember what those officers looked**
 15 **like, the ones who interviewed you?**
 16 A. No, I don't remember because it was such a
 17 long time ago and everything. It was a long time
 18 ago.
 19 **Q. Did -- did those officers ask you to sign**
 20 **a statement?**
 21 A. Yes.
 22 **Q. Did you sign that statement?**
 23 A. They -- I signed the statement. They
 24 printed it off on the computer.
 25 **Q. Now, can you tell me when -- did you sit**

1 **with the officers as they typed your statement, or**
 2 **did they bring you a statement to sign?**
 3 A. They was writing in -- you know how they
 4 have their little handbook? The little books they
 5 flip over. And they was writing it in there. And
 6 then he went and typed it up afterwards.
 7 **Q. Now, when they typed it up afterwards, did**
 8 **you go with them to a computer to type it up or --**
 9 A. No.
 10 **Q. -- did you leave where you --**
 11 A. No. No. I was sitting in -- what you
 12 call a little cul-de-sac, like a off- -- a little
 13 office thing where they have them by -- split them
 14 in half. No, I didn't go with them.
 15 **Q. Okay. One second. Okay.**
 16 **So if the police had written down**
 17 **everything you told them, they would have written**
 18 **down that you saw Reginald Thomas or -- you -- that**
 19 **you saw Reggie and Kiki commit the murder; right?**
 20 A. Right.
 21 **Q. Do you recall a female prosecutor who**
 22 **asked you questions at Keith Carnes's criminal**
 23 **trial?**
 24 A. Yes.
 25 **Q. And was that -- was that Amy McGowan, or**

1 **was that someone else?**
 2 A. First, it was Amy, and then it was
 3 Ms. Parson [sic].
 4 **Q. Okay. And did -- did Ms. Parsons -- and**
 5 **so did Ms. Parsons actually ask you questions at the**
 6 **trial about what you had seen?**
 7 A. I don't recall what's -- the questions she
 8 asked me.
 9 **Q. So, you know, not which questions she**
 10 **asked you, but do you remember that she asked you**
 11 **questions at the trial?**
 12 A. Yes, she did.
 13 **Q. Did -- and did you talk to Ms. Parsons**
 14 **before she asked you questions, like, in front of**
 15 **the judge?**
 16 A. No.
 17 **Q. Did you ever tell Ms. Parsons that you had**
 18 **been pressured to identify Keith Carnes?**
 19 A. No.
 20 **Q. And why didn't you tell her?**
 21 A. I was afraid.
 22 **Q. Before -- did Ms. Parsons ever ask you if**
 23 **you had been pressured before she examined you in**
 24 **court?**
 25 A. No, she did not.

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1 still bad today?

2 A. No.

3 Q. This event you saw, seeing Larry White be
4 shot and killed -- is that something that stands out
5 to you in your memory?

6 A. Yes.

7 Q. And do you remember -- do you know someone
8 by the name of Latahra Smith?

9 A. Yes.

10 Q. And do you remember -- do you remember
11 when you first -- when you first met Latahra Smith?12 A. 2015 -- 2014 -- 2015, something like that,
13 maybe 2016. I don't remember what year it was.14 Q. Okay. And did -- did -- what was your
15 understanding when you met Latahra Smith of why she
16 was talking to you?

17 A. She was talking to -- about Keith Carnes.

18 Q. Okay.

19 A. That's how I really learnt his name in the
20 beginning, his real name.21 Q. Did Latahra Smith ever ask you to lie on
22 Keith Carnes's behalf?

23 A. No.

24 Q. Did she ever promise you anything for
25 helping her?

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1 A. No.

2 Q. Did she ever threaten you in -- in any
3 way?

4 A. No, she haven't.

5 Q. Give me one second, please.

6 Do you -- do you recall testifying a few
7 years ago when Keith Carnes had a habeas hearing?

8 A. Yes, I do.

9 Q. And did you tell the truth then about what
10 you saw the night Larry White was murdered?

11 A. Yes, I did.

12 Q. And how did it feel to tell the truth when
13 you testified then?14 A. It -- it just -- my whole -- it lift up a
15 whole lot of things off my heart. Because at this
16 point, when I was really sick, I didn't think I was
17 going to make it and -- to testify for him in his
18 court case.

19 Q. And had you -- one second.

20 Did you feel any guilt about testifying
21 against Keith Carnes back in 2005?

22 A. Yes, I did.

23 Q. And why did you feel guilt?

24 A. It was just -- I mean, it was just eating
25 at me. It -- it -- physically, it was tearing me1 down; mentally, it was tearing me down. So I just
2 needed to get this out.

3 Q. (By Mr. Hilke) Okay.

4 MR. HILKE: Ms. Morrow, I don't have any
5 more questions right now. I should have mentioned
6 you can take a break whenever you want and -- to use
7 a bathroom or whatever.

8 THE WITNESS: Okay.

9 MR. HILKE: I expect the other attorneys
10 might have some questions for you too.

11 THE WITNESS: Okay.

12 MR. HILKE: Do you need a bathroom break
13 or anything before we continue?14 THE WITNESS: No. We can just go ahead
15 and get this over with -- get it -- get it over with
16 because, like I said, I have things to do.

17 MR. HILKE: Okay.

18 MS. PETERS: Ms. Morrow, my name is Diane
19 Peters. Can you see me on your screen?20 THE WITNESS: No, I don't see you. I
21 just --

22 MS. PETERS: I'll wave.

23 THE WITNESS: I still see him. I don't
24 see you.

25 MS. PETERS: Can you see me?

1 THE WITNESS: No. Just got a picture of
2 me. I just see me. Just me.3 MS. PETERS: You can hear me, though;
4 right?5 THE WITNESS: I can hear you. Yes, ma'am.
6 EXAMINATION

7 BY MS. PETERS:

8 Q. I represent the Kansas City Missouri Board
9 of Police Commissioners, some detectives, and some
10 police officers in this lawsuit that Keith Carnes
11 has filed. Okay?

12 A. Okay.

13 Q. I have some questions for you. Earlier
14 you said that you were sick, and I got the
15 impression, when you said you were sick, you meant
16 at the time Larry White's homicide happened. Did I
17 understand that correctly?

18 A. Yes, ma'am.

19 Q. Can you elaborate on --

20 A. I had --

21 Q. -- that.

22 A. -- systematic -- systematic [sic] lupus.

23 Q. Did your illness, lupus, interfere with
24 your ability to tell the truth back then at --

25 A. No.

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1 THE REPORTER: One at a time.
 2 **Q. (By Ms. Peters) Did your ability -- did**
 3 **your illness, lupus, cause you or interfere with**
 4 **your ability to tell the truth in 2003, 2004, and**
 5 **2005?**
 6 A. No.
 7 **Q. You testified earlier that you talked to**
 8 **Mr. Wally Hilke; is that correct?**
 9 A. Correct.
 10 **Q. How many times have you talked to**
 11 **Mr. Hilke?**
 12 A. Maybe three times.
 13 **Q. How many of those times were over the**
 14 **phone?**
 15 A. All -- twice -- maybe -- twice over the
 16 phone.
 17 **Q. How many of those times were in person?**
 18 A. Once.
 19 **Q. When was the first time you talked to**
 20 **Mr. Hilke?**
 21 A. I don't remember the date, but that was
 22 the first time I met him in person.
 23 **Q. And then --**
 24 A. I don't remember.
 25 **Q. How long ago?**

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1 A. Maybe 4th -- last year. It was last year.
 2 I don't remember what month.
 3 **Q. So sometime last year, you met Mr. Hilke**
 4 **for the first time, and that was in person?**
 5 A. Yes, ma'am.
 6 **Q. Where was that?**
 7 A. Downtown.
 8 **Q. Downtown where?**
 9 A. He was in a hotel.
 10 **Q. Do you mean downtown Kansas City,**
 11 **Missouri?**
 12 A. Yes.
 13 **Q. Did you meet him at the hotel?**
 14 A. Yes.
 15 **Q. What was the name of the hotel?**
 16 A. I can't remember what hotel he stayed in,
 17 because they just built it up. I just -- I don't
 18 remember.
 19 **Q. And how did you know to meet him at the**
 20 **hotel?**
 21 A. He called me and told me he'd be in town.
 22 **Q. So he called you?**
 23 A. Uh-huh.
 24 **Q. He called you and asked you to meet with**
 25 **him at the hotel?**

1 A. Yes.
 2 **Q. So you had a phone call. Then you met him**
 3 **in person at the hotel, and then you talked to him**
 4 **two more times on the phone; is that correct?**
 5 A. That's correct.
 6 **Q. When he talked to you on the phone to ask**
 7 **if you'd meet him at the hotel, was that the first**
 8 **time that you talked to him?**
 9 A. Yes, ma'am.
 10 **Q. Do you know how he got your phone number?**
 11 A. Yes.
 12 **Q. How?**
 13 A. Latahara.
 14 **Q. Did Mr. Hilke tell you he got your phone**
 15 **number from Latahara?**
 16 A. I'm -- I'm just assuming that's where he
 17 got my number from. I'm not sure.
 18 **Q. So tell me about this very first**
 19 **conversation with Mr. Hilke on the phone when he**
 20 **asked you to meet him at the hotel.**
 21 A. He -- he said he wanted to ask me a few
 22 questions about -- relating to Keith Carnes and the
 23 matter. That's -- basically was it.
 24 **Q. And did he ask you any of those questions**
 25 **on the phone?**

1 A. In person.
 2 **Q. Okay. So he told you that he wanted to**
 3 **ask you some questions about Keith Carnes; correct?**
 4 A. Yes.
 5 **Q. And did he ask you if you'd be willing to**
 6 **meet with him?**
 7 A. Yes.
 8 **Q. And did he set up a place and time and day**
 9 **to meet then?**
 10 A. Yes, he set up a place to meet. And that
 11 was downtown because he had came into town. I'm
 12 assuming he don't live in Kansas City.
 13 **Q. What else did you and Mr. Hilke talk about**
 14 **on the phone that very first time?**
 15 A. That he -- you know, he was talking
 16 about -- nice for him to do -- to meet me and -- and
 17 everything. Not too much of anything --
 18 **Q. Did he tell you that --**
 19 A. Nothing important.
 20 THE REPORTER: Excuse me. Very "nice to
 21 meet you," and what did you say after that?
 22 A. He just asked -- very nice to meet me
 23 and -- about -- he was Keith Carnes's lawyer and
 24 that he needed to discuss some matter with me
 25 concerning Keith.

1 **Q. (By Ms. Peters)** When he told you that he
 2 was Keith Carnes's lawyer, did he also tell you that
 3 Keith Carnes had a lawsuit against the police and
 4 prosecutor Amy McGowan?

5 A. Yes.

6 **Q. Okay. What did he tell you about the**
 7 **lawsuit?**

8 A. I really don't recall how much he told me
 9 about the lawsuit.

10 **Q. Then you met with Mr. Hilke at the hotel;**
 11 **right?**

12 A. Right.

13 **Q. And did you sit in a room in the lobby**
 14 **somewhere and -- with Mr. Hilke and discuss matters?**

15 A. Actually, I was waiting in the lobby
 16 because he had another person in there who was up
 17 there talking to him, and he came downstairs and got
 18 me.

19 **Q. And did you and Mr. Hilke then sit down in**
 20 **the hotel and have a discussion?**

21 A. Yes.

22 **Q. And -- and what did you discuss?**

23 A. Discussing this lawsuit.

24 **Q. And, more specifically, did Mr. Hilke ask**
 25 **you certain questions?**

1 A. Yes.

2 **Q. And what did he ask?**

3 A. He just asked me what did I remember
 4 about -- that happened that night when Larry got
 5 killed and -- about what -- how much do I remember
 6 what happened in the trial and did -- do I know what
 7 happened. And I did.

8 **Q. Did Mr. Hilke show you any photographs?**

9 A. No, ma'am.

10 **Q. Did he show you any other documents?**

11 A. No, ma'am.

12 **Q. How long did that meeting last with**
 13 **Mr. Hilke?**

14 A. Thirty minutes.

15 **Q. And then do you recall how you and**
 16 **Mr. Hilke left the meeting? And by that, I mean did**
 17 **Mr. Hilke say, "I'll call you," or "Will you give a**
 18 **deposition," or anything of that nature?**

19 A. Yes. He said he'd be getting in touch
 20 with me.

21 **Q. And then you said there was a phone call**
 22 **with Mr. Hilke after that; correct?**

23 A. Correct.

24 **Q. And how much later, after your meeting in**
 25 **the hotel with Mr. Hilke, was the phone call with**

1 **him?**

2 A. February.

3 **Q. February of 2023?**

4 A. February of 20- -- this year is when I
 5 spoke with him again.

6 **Q. February of 2024?**

7 A. Right.

8 **Q. And can you tell me what that conversation**
 9 **entailed.**

10 A. The conversation entailed of -- just
 11 deposition we're doing right now.

12 **Q. How long did that phone conversation last?**

13 A. It didn't last too long.

14 **Q. Did that conversation last five minutes?**

15 A. I would say ten at the most.

16 **Q. And in that conversation, February of**
 17 **2024, you discussed setting up your deposition with**
 18 **Mr. Hilke?**

19 A. Yes.

20 **Q. What else did you discuss with Mr. Hilke**
 21 **during that phone call, if anything?**

22 A. I discussed with him that I was having
 23 surgery on February the 5th, which I was having a
 24 hip replacement, and we discussed that, and I said,
 25 "If you could let me heal and -- and then we'll get

1 the deposition done," yeah.

2 **Q. And then it's your testimony that you had**
 3 **another phone conversation with Mr. Hilke after**
 4 **that; correct?**

5 A. Correct.

6 **Q. And then when was that next phone call?**

7 A. I told him that I wasn't completely
 8 healed. And it was in -- this is May -- it was in
 9 April. And I told him I wasn't completely healed
 10 yet. He said, well, he'll talk to you guys about
 11 that.

12 **Q. So you had a phone call with Mr. Hilke in**
 13 **April 2024 about doing your deposition and you**
 14 **healing from a surgery?**

15 A. Right. Correct.

16 **Q. In the phone call in February with**
 17 **Mr. Hilke in February 2024, did you discuss any more**
 18 **facts about the homicide of Larry White?**

19 A. No. We did not at that time.

20 **Q. How about in April of 2024 with the phone**
 21 **call with Mr. Hilke? Did you discuss anything more**
 22 **about the facts of Larry White's homicide?**

23 A. Yes.

24 **Q. And tell me about that.**

25 A. He was just asking me questions -- what --

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1 what do I remember, what I saw at the time of his 2 homicide.	1 Q. What is Eric's last name? 2 A. Morrow. And so is Eran.
3 Q. Have you spoken to anyone from Mr. Hilke's 4 law firm, that you know of, other than Mr. Hilke?	3 Q. Did you know Larry White in -- in any 4 other way other than he went to school with your 5 three oldest sons?
5 A. Only him.	6 (Technical issue. Discussion off record.)
6 Q. When was the last time you spoke with 7 Ms. Latahra Smith?	7 A. I know his mother, his grandmother, his 8 sister -- I knew -- I knew his whole family -- and 9 his uncles.
8 A. Oh, it's been since last year.	10 Q. (By Ms. Peters) How did you know the 11 White family?
9 Q. When you spoke with Ms. Latahra Smith last 10 year, what was the occasion that caused you to speak 11 with Ms. Smith?	11 A. We lived in the same neighborhood.
12 A. That occasion -- it was -- think his -- 13 his trial was coming up again -- Keith.	13 Q. For how many years did you live in the 14 same neighborhood as the White family prior to Larry 15 White's murder?
14 Q. What trial was that?	14 A. Oh, maybe 20, 30 years.
15 A. The trial when he -- his conviction got 16 overturned.	17 Q. Did you grow up with some members of the 18 White family?
17 Q. Ma'am, I want to ask you about some of the 18 events of the night of the homicide. You've already 19 testified to some of it. I believe you testified 20 earlier that you were going to a friend's house on 21 October 6th, 2003. Is that correct?	18 A. Yes.
22 A. Correct.	19 Q. Who did you grow up with?
23 Q. Do you remember the friend's name?	20 A. With his mom and his uncles.
24 A. Yes. His name was Michael Thompson.	21 Q. And when you say "his mom and his uncles,"
25 Q. And you had a niece that lived at 30th and	22 Q. do you mean Larry White's?
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1 Wabash?	1 Q. What's Tim and Michael's last name?
2 A. Yes.	2 A. White.
3 Q. What's your niece's name, ma'am?	3 Q. What was Larry's mom's name?
4 A. Brenda White.	4 A. I can't remember her name. I don't 5 remember her name. I don't recall it right 6 offhand -- her name.
5 Q. Can you say that first name again.	7 Q. Is she deceased now? Do you know?
6 A. Brenda.	8 A. All of those -- all of them are deceased.
7 Q. By the way, Ms. Morrow --	9 Q. So you grew up --
8 A. Uh-huh.	10 A. The uncles and the mom -- and the -- 11 her -- his mom.
9 Q. -- going back to 2003, did you know Larry 10 White?	12 Q. So you grew up with Larry White's mom and 13 Larry White's uncles Tim and Michael White?
11 A. Yes, ma'am.	14 A. Yes.
12 Q. How did you know Larry White?	15 Q. What was Larry White's grandmother's name?
13 A. Larry White went to school with my sons.	16 A. I can't remember her name either 17 because --
14 Q. With how many of your sons?	18 Q. Does Juanita --
15 A. He went to school with my three oldest 16 son.	19 A. -- we used to call her -- we used to call 20 her -- you know, back then we just call them 21 "Grandma" or -- you know, we'd never call them by 22 their first name.
17 Q. Can you tell me the name of your three 18 oldest sons?	23 Q. Does "Juanita White" ring a bell?
19 A. Rickey, Eric, and Eran.	24 A. Yes. Juanita -- mom.
20 Q. How does Eran spell his name?	25 Q. Who was Juanita White?
21 A. E-r-a-n.	
22 Q. Is Rickey and Eric and Eran's last name 23 Morrow?	
24 A. Rickey's last name is Gardner, 25 G-a-r-d-n-e-r.	

1 A. I'm -- I'm thinking it's his mom or either
 2 his sister, because he's had a sister named Juanita
 3 too.

4 **Q. Okay. You think it was Larry White's mom
 5 or Larry White's sister?**

6 A. Yes.

7 **Q. Do you remember what Larry White's
 8 grandmother's name was?**

9 A. No, ma'am. Because at the time we just
 10 called them "Grandma."

11 **Q. Okay.**

12 A. We didn't call them by their first name.

13 THE REPORTER: Okay. Just remember. One
 14 at a time. Pause.

15 **Q. (By Ms. Peters) During the time that
 16 Larry White was murdered, were you friends with any
 17 members of the White family?**

18 A. Yes.

19 **Q. Who were you friends with?**

20 A. Michael White and -- and Tim White.

21 **Q. Where did Michael and Tim White live at
 22 the time?**

23 A. On the corner of 29th and Olive.

24 **Q. And, just to be clear, Tim and Michael
 25 White lived on the corner of 29th and Olive in**

1 **Kansas City, Missouri?**

2 A. Yes, ma'am. The whole family lived in a
 3 big house right there.

4 **Q. Back in 2003 they lived there; correct?**

5 A. Yes.

6 **Q. Okay. After you witnessed the murder of
 7 Larry White, who is the first person that you talked
 8 to about the murder of Larry White?**

9 A. The first person I talked to about the
 10 murder of Larry White was my niece.

11 **Q. Is that niece Brenda White?**

12 A. Yes.

13 **Q. What did you tell Brenda White?**

14 A. I just told her what I seen because I was
 15 crying and upset, and then she -- I didn't go back
 16 around there no more because it was just
 17 traumatizing me.

18 **Q. Did you tell Brenda White who got
 19 murdered?**

20 A. Yes.

21 **Q. Did you tell Brenda White who you saw
 22 murder Larry White?**

23 A. Yes.

24 **Q. And who did you tell her?**

25 A. I told her that Kiki and Reggie killed

1 Larry.

2 **Q. And -- and when was it that you talked to
 3 your niece Brenda White about the murder of Larry
 4 White?**

5 A. She had came over to where I was staying
 6 at, because, actually, I did live on 26th and Benton
 7 with my friend Michael.

8 **Q. When did you talk to Brenda White about
 9 the murder of Larry White?**

10 A. Maybe two or three days later.

11 **Q. Did you talk to your niece Brenda White
 12 before or after your first conversation with Amy
 13 McGowan?**

14 A. I talked to her before (indiscernible) --

15 THE REPORTER: Excuse me. Real quick.
 16 You said you talked to her before, and then there
 17 was a little glitch. Was there anything after that?

18 THE WITNESS: Okay. Oh, I'm sorry.

19 A. Before.

20 **Q. (By Ms. Peters) I can clar- -- let -- let
 21 me ask again. So -- let me ask you the question
 22 again so we're clear.**

23 A. Okay.

24 **Q. Did you talk to your niece Brenda White
 25 about the homicide of Larry White before or after**

1 **your first conversation with Amy McGowan?**

2 A. It was before.

3 **Q. When you talked to your niece Brenda White
 4 about the homicide of Larry White, who else was
 5 present during that conversation?**

6 A. Just me and her.

7 **Q. And was that conversation at your house at
 8 26th and Benton?**

9 A. Yes. We was talking in private, yes.

10 **Q. Who was the next person that you talked to
 11 about the homicide of Larry White after speaking to
 12 your niece Brenda White?**

13 A. Well, I think my -- Brenda, because Brenda
 14 didn't know Larry -- Larry White too. So she -- she
 15 is the one that talked to his family. It wasn't me.
 16 She told them.

17 **Q. Brenda White, your niece, is the one that
 18 told Larry White's family what?**

19 A. About what I seen at -- when Larry got
 20 murdered.

21 **Q. And how do you know that your niece told
 22 Larry White's family that?**

23 A. She told me.

24 **Q. So Brenda White, your niece, told Larry
 25 White's family that you, Lorianne Morrow, witnessed**

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1 Kiki and Reggie kill Larry White?

2 MR. HILKE: Objection to foundation.

3 A. Yeah.

4 Q. (By Ms. Peters) And you know that because
5 Brenda White told you that?6 A. She told -- she told me she told them,
7 yes.**8 Q. So after you spoke with your niece Brenda**
9 White, who was the next person that you talked to
10 about the murder of Larry White?

11 A. Amy.

12 Q. Amy McGowan?

13 A. Yes.

14 Q. Before I ask you some questions about Amy
15 McGowan, let me ask you this: Did you ever -- did
16 you ever talk to any member of the White family
17 about the murder of Larry White?

18 A. No.

19 Q. Did any member of the White family ever
20 tell you to say Keith Carnes murdered Larry White?

21 A. No.

22 Q. One moment, please.**Did Larry White's family ever tell you who**
24 they thought was the shooter?

25 A. No.

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1 Q. Did Larry White's family ever tell you
2 they thought the shooter was Keith Carnes?

3 A. No.

4 Q. Did Larry White's family ever tell you
5 that you should identify Keith Carnes as the
6 shooter?

7 A. No.

8 Q. Did Larry White's family ever offer to pay
9 you if you identified Keith Carnes as the shooter?

10 A. No, ma'am.

11 Q. Did Larry White's family ever show up at
12 your house and offer to pay you money if you
13 identified Keith Carnes as the shooter?

14 A. No, ma'am.

15 Q. Did Larry White's mother ever go to your
16 house and say she would pay you money if you
17 identified Keith Carnes as the shooter?

18 A. No, ma'am.

19 Q. Did Larry White's family ever threaten you
20 in any way regarding the -- strike that.**21 Did you ever feel threatened in any way --**

22 A. No, ma'am.

23 Q. -- relating to Larry White's
24 homicide -- well, strike that.**25 Let me ask -- I'm asking you bad****1 questions. Let me ask you another question.****2 Did Larry White's family ever cause you to**
3 feel threatened relating to the murder of Larry
4 White?

5 A. No, ma'am.

6 Q. Did you ever testify at the habeas hearing
7 for Mr. Carnes that Larry White's family told you to
8 identify Keith Carnes as the shooter?

9 MR. HILKE: Objection to foun- --

10 A. No, ma'am.

11 MR. HILKE: Wait -- wait. I -- I need to

12 put an objection on the record.

13 Objection to foundation.

14 You can answer.

15 Q. (By Ms. Peters) Did you testify, ma'am,
16 that -- at Keith Carnes's habeas hearing in 2021
17 that the -- Larry White's family told you to
18 identify Keith Carnes as the shooter?

19 MR. HILKE: Same objection.

20 A. No, they didn't.

21 Q. (By Ms. Peters) My question was a little
22 bit different. My question was did you testify
23 under oath at the habeas hearing in 2021 that Larry
24 White's family told you to identify Keith Carnes as
25 the shooter?

1 MR. HILKE: Same objection.

2 Q. (By Ms. Peters) You can answer.

3 A. They never asked me to -- none of that,

4 no.

5 Q. Okay. So you never testified to that --
6 was my question.

7 MR. HILKE: Same objection.

8 A. Yes, I never testified to that. Yes,

9 ma'am.

10 Q. (By Ms. Peters) Do you recall what your
11 testimony was from the 2021 habeas hearing?

12 A. I recall what it was.

13 Q. So when I'm asking you if you testified at
14 the 2021 habeas hearing whether Larry White's family
15 told you to identify Keith Carnes as the shooter
16 you -- you remember that you did not testify to that
17 under oath; correct?

18 A. I did not --

19 MR. HILKE: Same objection.

20 A. -- testify to that.

21 Q. (By Ms. Peters) Okay. So the second
22 person that you spoke to about Larry White's
23 homicide was Amy McGowan?

24 A. Yes.

25 Q. And can you describe how that meeting came

1 **about.**

2 MR. HILKE: Objection to form.

3 But you can answer. You can answer.

4 A. Okay. The meet- -- how the meeting came
5 about is when I was walking in the same area where
6 it happened at -- and she pulled up on a lot of
7 people that was standing out there. I -- I can also
8 name the people if you would like.

9 **Q. (By Ms. Peters) Please, ma'am. Identify
10 all the people that were standing there.**

11 A. Okay. It was Wendy Lockett and the
12 lady -- she's passed away now -- and it was --
13 what's -- what's the girl's name? I can't think of
14 that other girl's name, but she was standing out
15 there. She also passed away. But Wendy Lockett
16 was -- was the main person that was out there as
17 well.

18 **Q. The other person that you're talking about
19 but can't remember her name -- is that Felicia
20 Jones?**

21 A. Yes.

22 **Q. Did Felicia Jones pass away?**

23 A. I'm thinking she did.

24 **Q. So you, Wendy Lockett, and Felicia Jones
25 were standing in the area where the homicide**

1 **occurred?**

2 A. And I don't think this is the girl's real
3 name, but she went by Star. She was a white female.

4 **Q. Anybody else that you can think of right
5 now that was standing with you at that time?**

6 A. No. But it was a lot of people out there.
7 I didn't know everybody that was out there. I just
8 knew the main people.

9 **Q. So let me ask you this question. You,
10 Wendy Lockett, Felicia Jones, and a white female
11 that went by Star were standing in the area where
12 the homicide occurred when Amy McGowan drove up on
13 you?**

14 A. Yes.

15 **Q. And this occurred how many days after
16 Larry White's homicide?**

17 A. I can't remember if he got murdered a
18 weekday or weekend, but it was after that. It was
19 just a few days after. It wasn't -- not exactly
20 after, but just a few days after it.

21 **Q. Ma'am, I know this was over 20 years ago.
22 Can you tell me exactly how many days after the
23 homicide that -- that Amy McGowan drove up on you
24 the first time?**

25 A. I don't want to give an incorrect answer.

1 I want to say maybe four or five days. I don't want
2 to give an incorrect answer.

3 **Q. Because earlier in your deposition today,
4 you said it was a couple of days.**

5 A. A couple of days to me is like a week,
6 because that's -- that's how we speak in general. I
7 mean -- maybe you're not used to speaking like that.

8 **Q. I'm not.**

9 A. A couple days is like a week. Yes. Yes.
10 THE REPORTER: One at a time, please.

11 **Q. (By Ms. Peters) So Amy McGowan drove up
12 on you about a week after the homicide?**

13 MR. HILKE: Object to form.
14 You can answer.

15 A. Yes.

16 **Q. (By Ms. Peters) And when Amy McGowan
17 drove up on you about a week after the homicide,
18 Wendy Lockett, Felicia Jones, and Star were with
19 you?**

20 A. They were there, yes.

21 **Q. What was Wendy Lockett doing at that time?**

22 A. Wendy Lockett always hung out over there.

23 **Q. And just to make sure we're talking about
24 the same area, you're talking about the area of
25 29th-Wabash-Olive area?**

1 **occurred?**

1 A. Yes, ma'am.

2 **Q. What do you recall Felicia Jones doing
3 over there at the time Amy McGowan drove up on you
4 the first time?**

5 A. She also lived in that neighborhood. She
6 lived in the neighborhood. Wendy did.

7 **Q. And same question for Star. What do you
8 recall Star doing at that time?**

9 A. Hanging out.

10 **Q. And you may have said this, and I
11 apologize, but do you know Star's first or last
12 name?**

13 A. I really don't -- really know her first
14 and last name because she went by Star, but she
15 never used her -- because a lot of people didn't use
16 their real name. They didn't want people to know
17 their real name. No.

18 **Q. At the ti- -- now, let me go back to the
19 night of Larry White's homicide. Did you see Wendy
20 Lockett at -- in the area on the night of Larry
21 White's homicide?**

22 A. Yes, ma'am.

23 **Q. What did you see Wendy Lockett doing on
24 the night of Larry White's homicide?**

25 A. I mean, she -- she was getting high on the

1 apartment building step. There was apartment
2 building right there before you reached the church
3 parking lot too as well. It's not there no more.

4 **Q. Was she -- was she -- I'm sorry. You said
5 she was standing outside?**

6 A. She was sitting on the porch getting high
7 off of crack cocaine. You mean -- I mean, I'll just
8 say it, you know.

9 **Q. What porch building do you recall her
10 sitting at?**

11 A. It's -- it's -- it'll be on the -- it
12 would be on -- what? -- it'd be on the right-hand --
13 across from the -- the house where they found the
14 gun case -- shell casing at. It was apartment
15 building there. It's not there anymore, though.

16 MS. PETERS: So, Wally, if you don't mind,
17 just for the record --

18 **Q. (By Ms. Peters) I'm going to have
19 Mr. Hilke pull up the diagram again so you can show
20 us where you saw Wendy Lockett.**

21 A. Okay. Yes, ma'am.

22 MR. HILKE: I've got it up.

23 A. Okay.

24 **Q. (By Ms. Peters) Ms. Morrow, can you just
25 identify on Exhibit 1 where you saw --**

1 A. Okay.

2 **Q. -- Wendy Lockett.**

3 A. Okay. There's -- Wendy Lockett -- that
4 was 2846 Wabash, and right across the street from
5 that apartment -- I mean, from the house -- was a
6 apartment building standing there. Right --
7 now it's a -- now it's a vacant lot.

8 **Q. Okay. So Wendy Lockett was standing on a
9 porch getting high at a -- an apartment building
10 that was located at 2506 East 29th Street?**

11 A. Yes.

12 **Q. Who else did you see sitting there with
13 Wendy Lockett on that porch?**

14 A. It was a few guys. Star was there, and
15 the lady name you mentioned earlier. They was all
16 there.

17 **Q. Felicia Jones was there too?**

18 A. Yes.

19 **Q. And just so it's clear for the record, on
20 the night that Mr. White was murdered, you saw Wendy
21 Lockett, Star, Felicia Jones sitting on the front
22 porch of 2506 East 29th Street?**

23 A. Yes, ma'am.

24 **Q. And when did you first see them that
25 night?**

1 A. You know, when I was walking down the
2 street. When I walked down the street, I would have
3 to make a right-hand turn to the corner because
4 they -- before -- I didn't get across the street all
5 the way yet. They was on the other side of me
6 cross- -- me crossing over to -- closer to the
7 church because this was -- this apartment building
8 was, like, sitting behind the church.

9 **Q. Okay. And when you saw Kiki and Reggie
10 chasing Larry White, where did you see that chase
11 happening? And if you can show us on the diagram
12 ...**

13 A. Okay. This is the -- because the way they
14 came around behind the building -- no. Close to
15 2846 Wabash is a -- okay. There you go. Okay. The
16 alleyway. You can call it "buildings" because the
17 last apartment building is where they would be at.
18 (Indiscernible) --

19 **Q. Can you say that last --**

20 A. (Indiscernible.) The last apartment
21 building that were --

22 **THE REPORTER: Excuse me.**

23 A. -- they was --

24 **THE REPORTER: Excuse me. Stop. Your
25 internet -- your internet connection was shaky, and**

1 I couldn't understand what you were saying.

2 **Q. (By Ms. Peters) Can you just repeat what
3 you were saying, Ms. Morrow.**

4 A. Okay. I want you to understand me
5 clearly. The three apartments in a row -- the third
6 apartment --

7 (Discussion off the record.)

8 (A recess was taken.)

9 **Q. (By Ms. Peters) Okay. Ms. Morrow, we're
10 back on the record.**

11 **Before I forget, what's your address?**

12 A. Where I'm living now?

13 **Q. Yes, ma'am.**

14 A. 7204 Forest Avenue.

15 **Q. Kansas City, Missouri?**

16 A. Yes, ma'am, 64131.

17 **Q. Do you live with anyone?**

18 A. My son.

19 **Q. Which son?**

20 A. Junius Morrow.

21 **Q. And -- and what's your phone number?**

22 A. (816) 95-0986.

23 (Reporter clarification.)

24 A. (816) 915-0986.

25 **Q. (By Ms. Peters) Are you employed, ma'am?**

1 A. No, ma'am.
 2 Q. **What's your date of birth?**
 3 A. 7/20 -- (indiscernible) --
 4 Q. **Can you repeat that.**
 5 A. July the 20th, 1964.
 6 Q. **Okay. Before we took a break, we were**
 7 **talking about that you saw Wendy Lockett, Felicia**
 8 **Jones, and Star sitting on the front porch of a**
 9 **house that you've identified on a diagram on the**
 10 **night of Larry White's homicide. Do you recall**
 11 **that?**
 12 A. It was an apartment, not a house.
 13 Q. **Sitting on the front porch of an**
 14 **apartment; correct?**
 15 A. Correct.
 16 Q. **And who else did you see on the night of**
 17 **Larry White's homicide in that area other than those**
 18 **women, Larry White, Kiki, Reggie, and Tre?**
 19 A. I don't remember these people name because
 20 I didn't communicate with them. You know, I wasn't
 21 friends with people.
 22 Q. **What do you -- do you remember their**
 23 **nicknames?**
 24 A. (Indiscernible.)
 25 Q. **I'm sorry. Did you say "No"?**

1 A. "No."
 2 Q. **Did you see anyone by the name of Debo, or**
 3 **do you recognize the name Debo?**
 4 A. I don't recognize that name.
 5 Q. **What do you recall seeing Felicia Jones do**
 6 **when you saw her on the porch of that apartment**
 7 **building on the night of Larry White's homicide?**
 8 A. After all this went down, I -- I don't
 9 know where she went afterwards, but I -- she was
 10 just sitting there and high with Wendy Lockett. And
 11 there was some other guy out there. I don't
 12 remember their name. I don't recall -- say one was
 13 named June Bug or something like ...
 14 Q. **Okay. Who is June Bug?**
 15 A. I don't even know his -- that's his street
 16 name. I don't know his real name.
 17 Q. **Where did you see June Bug?**
 18 A. He standing on the corner.
 19 Q. **Which corner?**
 20 A. I can't remember which corner it was, but
 21 when I was -- you know when I was walking up, I seen
 22 him. I don't remember which corner it was. It was,
 23 you know ...
 24 Q. **Okay. What was June Bug doing?**
 25 A. He was just talking to somebody. I

1 don't -- that's the only thing. He was just
 2 standing there talking to some guy. I don't know
 3 who it was he was talking to. I didn't stop to ask.
 4 I was just trying to do what I was going to do --
 5 where I was going.
 6 Q. **Did you ever have any conversation with**
 7 **Wendy Lockett about what you saw that night?**
 8 A. No, ma'am.
 9 Q. **What about with Felicia Jones? Did you**
 10 **have any conversation with her about what you**
 11 **witnessed on the night of Larry White's homicide?**
 12 A. No, ma'am.
 13 Q. **So let me go back to a week after the**
 14 **homicide, when Amy McGowan first drove up on you,**
 15 **Wendy Lockett, Felicia Jones, and Star. Okay?**
 16 A. Okay.
 17 Q. **Tell me the first thing that happened when**
 18 **Amy McGowan drove up on you.**
 19 A. I can't recall what was all said at that
 20 time, but I just can't remember what was said. I'm
 21 going to be honest.
 22 Q. **I'm sorry. You cut out that last part.**
 23 **Can you say that again.**
 24 A. I said I -- I don't recall everything,
 25 what was said.

1 Q. **Was Amy McGowan alone?**
 2 A. Yes.
 3 Q. **Were there any police around?**
 4 A. No, ma'am.
 5 Q. **What do you recall Amy McGowan saying to**
 6 **you?**
 7 A. About the homicide of Larry -- Larry White
 8 and was -- and was showing Mr. Carnes's picture
 9 saying that he -- he's the one that killed Larry.
 10 And that's not true.
 11 Q. **Did -- how did Amy McGowan introduce**
 12 **herself to you? Do you recall?**
 13 A. She just said "Amy McGowan." That's all
 14 she introduced her name. She didn't really say, at
 15 the time, "prosecutor." I don't remember her saying
 16 that.
 17 Q. **Did you know who she was at that time?**
 18 A. No, ma'am.
 19 Q. **Did you ask her who she was?**
 20 A. She said her name was Amy McGowan. That's
 21 how I knew her name, but other than me, you know --
 22 I don't really understand it but -- why she was
 23 there, I don't -- can't tell you.
 24 Q. **Did you know that she was a prosecutor at**
 25 **the time?**

1 A. Not until later on when we -- when she
 2 talked to me when we were standing there.
 3 Q. When you were standing where?
 4 A. On the corner talking to them.
 5 Q. Okay. So Amy McGowan pulls up in her
 6 vehicle. What kind of vehicle did she drive? Do
 7 you recall?
 8 A. I can't remember what it was because it
 9 was such a long time ago.
 10 Q. Does Amy McGowan -- did you see Amy
 11 McGowan get out of her vehicle?
 12 A. Ma'am, she never stepped out of the car.
 13 Not at all.
 14 Q. So Amy McGowan pulled up on you, Wendy
 15 Lockett, Felicia Jones, and Star, and she remained
 16 in her car?
 17 MR. HILKE: Object to form.
 18 A. Yes.
 19 Q. (By Ms. Peters) And what was the first
 20 thing that was said between the group of you?
 21 MR. HILKE: Objection. Asked and
 22 answered.
 23 You can answer.
 24 A. I'm assuming -- I'm assuming she knew
 25 Wendy.

1 Can you hear me?
 2 Q. (By Ms. Peters) Yes.
 3 Why do you assume she knew --
 4 A. I'm assuming -- well, Wendy was the
 5 police -- what they want to call them? -- snitch
 6 or -- or whatever.
 7 Q. And why do you assume she knew Wendy?
 8 A. Because she walked up to her car.
 9 Q. Wendy Lockett walked up to --
 10 A. (Indiscernible) --
 11 THE REPORTER: Stop. Stop. Stop. One at
 12 a time.
 13 Q. (By Ms. Peters) Wendy Lockett walked up
 14 to Amy McGowan's car?
 15 A. Yes, ma'am.
 16 Q. Were you standing there when Wendy Lockett
 17 walked up to Amy McGowan's car?
 18 A. Yes, ma'am.
 19 Q. Did you overhear any conversation between
 20 Wendy Lockett and Amy McGowan?
 21 A. No, not really. Not what they was talking
 22 about.
 23 Q. Okay. Was there any conversation that you
 24 heard between Felicia Jones and Amy McGowan?
 25 A. No.

1 Q. Was the first -- between you and Amy
 2 McGowan, who initiated the conversation? You or Amy
 3 McGowan?
 4 A. She initiated conversation with me.
 5 Q. And tell me what she first said to you.
 6 MR. HILKE: Objection. Foundation.
 7 Go ahead.
 8 A. I don't recall all the -- all the stuff
 9 that we talked about, but it was -- it was
 10 pertaining to the homicide.
 11 Q. (By Ms. Peters) She introduced herself as
 12 Amy McGowan; correct?
 13 A. Correct.
 14 Q. She didn't tell you who she was; correct?
 15 A. She introduced herself as Amy McGowan.
 16 Q. She told you her name?
 17 A. Yeah, I didn't -- yes.
 18 Q. But you didn't know why she was
 19 approaching you; correct?
 20 A. Of course.
 21 MR. HILKE: Object to form.
 22 (Reporter clarification.)
 23 A. Correct.
 24 (Discussion off the record.)
 25 Q. (By Ms. Peters) So, Ms. Morrow, if I

1 understand your testimony correctly, Amy McGowan
 2 pulled up; she introduced herself as Amy McGowan and
 3 started talking about Larry White's homicide?
 4 A. I'm assuming yes because she didn't talk
 5 to me first. She talked to Wendy, and she talked to
 6 the other lady first; so I'm assuming that, what
 7 it -- what it was really all about because of -- the
 8 area got bad. I don't know.
 9 Q. And that's my -- and I apologize. My -- I
 10 meant for my question to be when Amy McGowan first
 11 talked to you, she introduced herself as Amy McGowan
 12 and started talking about Larry White's homicide --
 13 A. Yes, ma'am.
 14 Q. -- correct?
 15 A. Yes, ma'am.
 16 Q. And you didn't know she was a prosecutor;
 17 correct?
 18 A. Correct.
 19 Q. You didn't know if she was police;
 20 correct?
 21 A. Correct.
 22 Q. Well, what was going through your mind?
 23 Who did you think she was?
 24 A. What was going through my mind at the time
 25 was people pay -- you know, I know the police

1 department pay people to give them information and
 2 to be a snitch for them. That was going through my
 3 mind because that's what Wendy Lockett was -- a
 4 snitch.

5 **Q. Well, how does that relate to who you
 6 thought Amy McGowan was?**

7 A. Just because of the -- you know, you can
 8 tell by people's body formation what the
 9 conversation may be talking about, but you couldn't
 10 clearly hear what they were saying.

11 **Q. And I believe you testified that Amy
 12 McGowan had a picture of Keith Carnes during her
 13 interaction with you this first time?**

14 A. The -- it was the first time. Yes, ma'am.

15 **Q. Right there on the street -- correct? --
 16 when she drove up on you?**

17 A. She had -- you know, you got the photo
 18 lineup book or whatever -- the police department
 19 have those. Yes, ma'am, she had pictures not only
 20 of him but other people as well.

21 **Q. Okay. So she brought a -- a book of
 22 photographs. Were they mug shots?**

23 A. Yes, ma'am. That's what you want to call
 24 them. Yes, ma'am.

25 **Q. So Amy McGowan had a book of mug shots**

1 want me to stop right there or just answer yet --
 2 what she said to me about?

3 **Q. Yeah. Please keep going. And I'm only
 4 holding my ear so -- hand here so I can hear you.**

5 A. Okay. So she told -- she showed -- when
 6 she showed me the photograph, she said -- I told her
 7 who the shooters that they showed me in the mug shot
 8 but -- and she said, "No. This is the man that
 9 killed Larry White," and no, he did not. But she
 10 also threatened to put me in jail if I did not say
 11 that Keith was the shooter.

12 **Q. So all that happened during your very
 13 first meeting with Amy McGowan there on the street a
 14 week after the homicide --**

15 A. Yes, ma'am. I was --

16 **Q. -- of Larry White?**

17 A. Yes, ma'am.

18 THE REPORTER: One at a time.

19 A. I was threatened.

20 **Q. (By Ms. Peters) You saw a picture of
 21 Reggie, Kiki, and Keith Carnes; correct?**

22 A. Correct.

23 **Q. And when is the next time that you talked
 24 to anyone about the homicide of Larry White after
 25 this meeting with Amy McGowan?**

1 **with her at this time. Did she show you those book
 2 of mug shots?**

3 A. Yes, ma'am.

4 **Q. Did you see her show that book of mug
 5 shots to Wendy Lockett?**

6 A. I don't know what she was looking at, but
 7 I know she showed me. I don't -- I can't speak for
 8 the other two people. I just can't do that.

9 **Q. Well, did you see Amy McGowan show Wendy
 10 Lockett anything?**

11 A. She was leaning over in her car. No,
 12 ma'am.

13 **Q. And when Amy McGowan showed you this book
 14 of mug shots, what happened?**

15 A. She -- the Reggie mug shot was in there.
 16 Kiki's mug shot was in there, but the other
 17 photograph she had of Keith Carnes -- a single
 18 photograph of him -- she didn't have it in the mug
 19 shot book. She just had a -- the mug shot of them
 20 in a book, but then with Keith Carnes, she had a
 21 single picture.

22 **Q. And what did she say to you or you say to
 23 her regarding those photographs?**

24 A. I pointed out Reggie and Kiki as the
 25 shooter as I did before but the photograph -- do you

1 A. I don't recall.

2 MS. PETERS: You okay?

3 THE WITNESS: My throat is dry because I'm
 4 talking too long.

5 A. I don't recall, ma'am.

6 MS. PETERS: Are you okay now?

7 THE WITNESS: Yeah. I guess my throat is
 8 a little dried up.

9 We can finish.

10 MS. PETERS: Okay.

11 **Q. (By Ms. Peters) When is the next time you
 12 interacted with Amy McGowan?**

13 A. Jackson County Courthouse building on 12th
 14 Street.

15 **Q. Is that the time when Sheriff Anthony --**

16 A. Excuse me.

17 **Q. Is that -- is that the time when a person
 18 by the name -- a law enforcement officer by the name
 19 of Anthony from the sheriff's office picked you up
 20 and brought you to the courthouse?**

21 A. Yes, ma'am.

22 **Q. Was anyone with Anthony from the sheriff's
 23 office when Anthony picked you up?**

24 A. No. He was by himself.

25 **Q. And where were you when Anthony from the**

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1 sheriff's office picked you up?		1 THE REPORTER: Okay.
2 A. I want to say over at my sister's house.		2 MS. PETERS: Same -- same for Diane
3 Q. What's that -- what was that address?		3 Peters.
4 A. It was on Gregory -- Gregory and		4 (The deposition was adjourned at
5 Cleveland, 71st, in Kansas City, Missouri. I can't		5 3:06 p.m., with the time and location of the
6 remember the whole complete address at the time		6 continuation to be agreed upon by all parties.)
7 because --		7
8 Q. And --	8	
9 A. -- at the --	9	
10 Q. And how much time after your first meeting	10	
11 with Amy on the street did the second meeting at her	11	
12 office happen?	12	
13 MR. HILKE: Objection. Foundation.	13	
14 You can answer.	14	
15 A. I don't remember it -- the time lapse.	15	
16 Q. (By Ms. Peters) I'm going to ask you to	16	
17 ballpark it if you can.	17	
18 MR. HILKE: Same objection.	18	
19 A. (Indiscernible.)	19	
20 Q. Was it day --	20	
21 A. (Indiscernible.)	21	
22 Q. I'm sorry. Was it a day?	22	
23 A. Maybe a -- maybe a month.	23	
24 MS. PETERS: Are you okay, ma'am?	24	
25 THE WITNESS: No, no, no, no. I'm	25	
	Page 82	Page 84
1 being -- my nose is bleeding. You know, I -- my		1 CERTIFICATE OF REPORTER
2 medicine does that. I'm -- I need a break.		2
3 MS. PETERS: Okay.		3 I, Susan J. Muckenthaler, a Certified Court
4 MR. HILKE: Let's take a break.		4 Reporter of the State of Missouri, do hereby
5 MS. PETERS: Let's take a break.		5 certify:
6 THE WITNESS: Okay.		6 That prior to being examined, the witness
7 THE REPORTER: Off the record 3:00		7 was first duly sworn;
8 o'clock p.m.		8 That said testimony was reported by me at
9 (A recess was taken.)		9 the time and place hereinbefore stated and was
10 THE REPORTER: Back on the record at		10 thereafter reduced to typewriting under my
11 3:05 p.m.		11 direction;
12 MR. HILKE: So Ms. Morrow has requested		12 That the foregoing transcript is a true
13 that we adjourn her deposition to be continued in		13 record of the testimony given by said witness;
14 person next Wednesday at Ms. Peters's office in		14 That I am not a relative or employee or
15 Kansas City. So we'll leave the deposition open at		15 attorney or counsel of any of the parties or a
16 this time and pick it up again Wednesday at		16 relative or employee of such attorney or counsel or
17 9:00 a.m. Ms. Peters, is that correct?		17 financially interested in the action.
18 MS. PETERS: That is correct. Ms. Morrow,		18 Witness my hand and seal June 17, 2024.
19 I hope you get to feeling better.		19
20 THE WITNESS: Yes, ma'am. Thank you.		Susan J. Muckenthaler
21 MR. HILKE: All right.		Certified Court Reporter
22 THE REPORTER: Okay. Can you tell me if		KS #1719, MO #1406
23 you want orders for this transcript?		<i>Susan J. Muckenthaler</i>
24 MR. HILKE: Yeah, plaintiff will take a		Susan J. Muckenthaler
25 regular e-tran, please.		Missouri Supreme Court
		Certified Court Reporter

1 ERRATA SHEET

2 RE: Keith Carnes v. Robert Blehm, et al.

3 PG/LN Correction and Reason for Change

4 _____

5 _____

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22 _____

23 _____

24 Lorianne Morrow

25 SJM

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1 SIGNATURE PAGE

2 RE: Keith Carnes v. Robert Blehm, et al.

3

4 I certify that I have read my testimony and

5 request that NO changes be made.

6

7 I certify that I have read my testimony and

8 request that the above changes be made.

9

10

11

12 _____

13 Lorianne Morrow

14

15

16 Subscribed and sworn to before me this

17 day of _____, 20____

18

19

20 _____

21 Notary Public

22 State of _____

23 County of _____

24 My commission expires _____

25 SJM

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